Appl. No. 10/040,293
Amdt. dated December 23, 2005   **DEC 2 3 2005**
Reply to Final Office Action of October 31, 2005

AFTER FINAL EXPEDITED PROCEDURE
REMARKS

     Claims 1 to 19 were pending in the application at the time of examination. Claims Claims 1 to 10, 12, 13, 15, 16, 18 and 19 stand rejected as anticipated.

     Claims 1 to 10, 12, 13, 15, 16, and 18 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent Application Publication No. 2002/0120864, hereinafter referred to as Wu. With respect to Claims 1, 4 and 7, the rejection stated, in part:

> . . . Wu et al. discloses a method, program and apparatus for managing identification in a data communications network comprising a user-controlled secure storage device, enrolling user of the user controlled secure storage device with an authority network site, providing information requested, storing the data, enabling the user-controlled secure storage device to release user data and use the user data at a service provider network site to obtain a service. (See page 4, Sections 0040-042)

     Applicants respectfully traverse the anticipation rejection of each of Claims 1, 4 and 7. Applicants respectfully note that it is not sufficient that Wu teach some authority network site, providing information requests, storing, etc. Rather, the MPEP requires:

> "A Claim is anticipated only if each and every element as set forth in the Claim is found, either expressly or inherently described, in a single prior art reference." . . . . . "The identical invention must be shown in as complete detail as is contained in the ... claim." (Emphasis Added.)

MPEP § 2131, 8th Ed., Rev. 3, p. 2100-76 (August 2005)

     The rejection paraphrases Applicants' claim language but does not identify any specific features in the reference in as complete detail as is contained in the ... claim. The rejection has not identified "a user-controlled secure storage device," that is received, in which user data is stored, and

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which is enabled to release user data. The cited paragraphs simply describes a transaction between a user, a partner site, and an information server using HTTP commands issued by the partner site. The HTTP command sent by the partner site is not a user-controlled secure storage device used as recited in Claim 1. The User interface control is not a user-controlled secure storage device used as recited in Claim 1.

It is not sufficient that the reference provide an overview of a transaction in the cited paragraphs, but rather the rejection must site a user-controlled secure storage device that is used as recited in the claims. The rejection has not provided sufficient specificity that it is even possible to determine what was considered to be the various elements recited in Claim 1. The cited paragraphs do not teach anything concerning such a device and so fail to anticipate Claims 1, 4 and 7 according to the above criteria from the MPEP. Applicants respectfully request reconsideration and withdrawal of the anticipation rejection of Claim 1.

Claim 4 is a program storage device corresponding to method Claim 1 and thus includes substantially the same distinctive feature as Claim 1. Claim 7 is a means-plus-function Claim corresponding to method Claim 1 and thus includes substantially the same distinctive feature as Claim 1. Accordingly, the above comments with respect to Claim 1 are incorporated herein by reference for Claims 4 and 7. Applicants request reconsideration and withdrawal of the obviousness rejection of each of Claims 4 and 7.

With respect to Claims 2, 5 and 8, the rejection stated, in part:

> . . . Wu et al. discloses a method, program and apparatus
> for managing identification in a data communications
> network comprising receiving a user-controlled secure
> storage device, enrolling user of the user-controlled
> secure storage device with authority network site,
> providing information requested, receiving the data in two

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portion comprising a cryptogram computed based on the
second portion, storing the data, enabling the user-
controlled secure storage device to release user data, and
using the user data at a service provider network site to
to obtain a service. (See page 4, Sections 0044-0045)

Applicants respectfully traverse the anticipation
rejection of Claim 2. Again, the rejection paraphrases
Applicants' claim language but does not identify any specific
features in the reference in as complete detail as is contained
in the ... claim. As in Claim 1, Claim 2 recites "a user-
controlled secure storage device," that is received, in which
user data is stored, and which is enabled to release user data.
The rejection of Claim 1 cited paragraphs 40 to 42 as teaching
exactly this element, but the rejection of Claim 2 relies upon
paragraphs 44 and 45. The differences in the rejection
demonstrates that the reference is being interpreted
differently, even though the claims include similar elements.

Paragraphs 44 and 45 do describe establishment of a user
account and permitting the user to establish different named
profiles and aliases for information subsets stored in the use
accounts. Accordingly, these paragraphs fail to teach anything
concerning a user controlled secure storage device.

In addition, the reference stated "The identifier,
potentially further based on an encrypted key token . . ."
There is no other mention of encryption in these paragraphs.
This teaches nothing about two portions of user data where one
of the portions is a cryptogram. Consequently, the rejection
failed to cite teachings at the same level of detail not only
of the operations associated with the secure storage device,
but also of the specific relationship of the user data.
Applicants respectfully request reconsideration and withdrawal
of the anticipation rejection of Claim 2.

Claim 5 is a program storage device corresponding to
method Claim 2 and thus includes substantially the same
distinctive feature as Claim 2. Claim 8 is a means-plus-

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function Claim corresponding to method Claim 2 and thus includes substantially the same distinctive feature as Claim 2. Accordingly, the above comments with respect to Claim 2 are incorporated herein by reference for Claims 5 and 8. Applicants request reconsideration and withdrawal of the obviousness rejection of each of Claims 5 and 8.

With respect to Claims 3, 6 and 9, the rejection stated, in part:

> . . . Wu et al. discloses a method, program and apparatus for managing identification in a data communications network presenting an identity credential request and data to be stored to a federated identity server via a client host, receiving an identity credential in response to randomized ID and receiving a logon credential in response to the service request (See pages 5-6, Section 0047 and Sections 0053-00547)

Applicants respectfully traverse the anticipation rejection of Claim 3. Again, based upon the above quotation from the MPEP, Applicants respectfully note that the rejection fails to consider explicit Claim limitations and so fails to meet the criterion required for by the MPEP for an anticipation rejection.

Again, the rejection itself demonstrates that Wu fails to show "The identical invention . . . in as complete detail as is contained in the ... claim." Claim 3 does not recite the rejected "receiving an identity credential in response to randomized ID" but rather,

> receiving an identity credential in response to said identity credential request, said identity credential comprising a randomized ID and an identification authority ID, said federated identity server capable of verifying the truthfulness, accuracy and completeness of said data to be stored

The rejection has not even alleged that Wu teaches this element but rather a totally different operation. This alone

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is sufficient to overcome the anticipation rejection of
Claim 3.

Further, the cited sections of Wu do not include the word
"randomized" and do not include any description of "verifying
the truthfulness, accuracy and completeness of <u>said data to be
stored</u>." Thus, Wu fails to satisfy the requirements of the
MPEP.

Finally, the rejection is incomplete, the rejection does
not even allege that Wu teaches:

> presenting a service request and said identity
> credential to a service portal, said service portal
> configured to issue an authentication request to said
> federated identity server

Thus, the anticipation rejection of Claim 3 is defective
for multiple reasons. Applicants respectfully request
reconsideration and withdrawal of the anticipation rejection of
Claim 3.

Claim 6 is a program storage device corresponding to
method Claim 3 and thus includes substantially the same
distinctive feature as Claim 3. Claim 9 is a means-plus-
function Claim corresponding to method Claim 3 and thus
includes substantially the same distinctive feature as Claim 3.
Accordingly, the above comments with respect to Claim 3 are
incorporated herein by reference for Claims 6 and 9.
Applicants request reconsideration and withdrawal of the
obviousness rejection of each of Claims 6 and 9.

With respect to Claims 10, 13 and 16, the rejection
stated, in part:

> . . . Wu et al. discloses a method for protecting privacy
> on a data communications network, receiving a user
> identifier and specific user data associated with the user
> identifier, the specific user data comprising data about a
> network user, creating user data based on specific user
> data, and returning the user identifier and the
> generalized user data. (See page 5, Section 0047)

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Applicants respectfully traverse the anticipation rejection of
Claim 10. Again, based upon the above quotation from the MPEP,
Applicants respectfully note that paraphrasing Applicants'
Claim 10 and citing generally to a portion of Wu. It is
impossible from this rejection to determine what is considered
in Wu to teach exactly the method of Claim 10.

Wu taught "The required independent receipt of both the
partner and user-identifiers ... " Thus, according to
paragraph 0047, the information server system does not receive
"a user identifier and specific user data" as recited in Claim
10, but instead a user identifier and a partner identifier.
Therefore, the rejection fails to meet the requirements of the
MPEP as quoted above. Applicants respectfully request
reconsideration and withdrawal of the anticipation rejection of
Claim 10.

Claim 13 is a program storage device corresponding to
method Claim 10 and thus includes substantially the same
distinctive feature as Claim 10. Claim 16 is a means-plus-
function Claim corresponding to method Claim 10 and thus
includes substantially the same distinctive feature as
Claim 10. Accordingly, the above comments with respect to
Claim 10 are incorporated herein by reference for Claims 13 and
16. Applicants request reconsideration and withdrawal of the
obviousness rejection of each of Claims 13 and 16.

With respect to Claims 12, 15, and 18, the rejection
stated, in part:

> . . . Wu et al. discloses a method for protecting privacy
> on a data communications network, storing user logon
> information for at least one service provider on a user-
> controlled secure device, the least one service provider
> server comprising at least one network server providing a
> service to a user, and logging on the device, and logging
> on providing access to the least one service provider
> server.. (See pages 7-8, Sections 0065-0068)

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Applicants respectfully traverse the anticipation rejection of
Claim 12.   Again, the rejection paraphrases Applicants'
Claim 12.   It is impossible from this rejection to determine
what is considered in Wu to teach exactly the method of
Claim 12.

In addition, the rejection has not identified what in Wu
is considered to be "a user-controlled secure storage device."
Since the browser is on the only user controlled device, Wu
taught away from

> storing user logon information for at least one
> service provider server on a user-controlled secure device

as recited in Claim 12 because a browser is not a user-
controlled secure device that stores logon information.
Accordingly, the cited portions of Wu fail to satisfy the
criterion from the MPEP as quoted above with respect to
Claim 12.   Applicants respectfully request reconsideration and
withdrawal of the anticipation rejection of Claim 12.

Claim 15 is a program storage device corresponding to
method Claim 12 and thus includes substantially the same
distinctive feature as Claim 12.   Claim 18 is a means-plus-
function Claim corresponding to method Claim 12 and thus
includes substantially the same distinctive feature as
Claim 12.   Accordingly, the above comments with respect to
Claim 12 are incorporated herein by reference for Claims 15 and
18.   Applicants request reconsideration and withdrawal of the
obviousness rejection of each of Claims 15 and 18.

Claim 19 is rejected under 35 U.S.C. 102(b) as being
anticipated by Ming-Chuan Wu et al., "Encoded Bitmap Indexing
for Data Warehouses," hereinafter referred to as Wu.   The
rejection stated in part:

> . . . a data structure stored in the memory, the data
> structure including a bit-mapped in the field determined
> by whether the user is a member of a group associated with

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the bit, the mapping for between bits in the field and
membership in a group maintained by an aggregation
authority. (See Abstract, page 220, and Section 2.1)

Applicants respectfully traverse the anticipation
rejection of Claim 19. Applicant expressly traversed this
rejection and the traverse was not even acknowledged in the
final office action. Accordingly, the final office action is
incomplete and should be withdrawn. Moreover, since the
comments were not rebutted, it is an admission that Applicants'
remarks were correct and so this claim should have been
allowed.

Again, based upon the above quotation from the MPEP, the
requirement for a reference is not that the reference teach
some general abstract concept related to the invention, but
rather the reference **must show** "The identical invention in as
complete detail as is contained in the ... claim."

Wu describes generally the concept of using "simple bitmap
indexing and the application domain for which it is ideally
suited." The application domain is defined by abstract
mathematical concepts and is not related by Wu to "membership
in a group." Further, the rejection cited no teaching of "the
mapping for between bits in said field and membership in a
group maintained by an aggregation authority," but simply
paraphrased the claim language. Accordingly, the rejection
failed to meet the criteria required by the MPEP for an
anticipation rejection. Applicants request reconsideration and
withdrawal of the anticipation rejection of Claim 19.

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Claims 1 to 10, 12, 13, 15, 16, 18 and 19 remain in the
application. Claims 11, 14 and 17 were previously cancelled.
For the foregoing reasons, Applicant(s) respectfully request
allowance of all pending claims. If the Examiner has any
questions relating to the above, the Examiner is respectfully
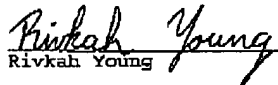requested to telephone the undersigned Attorney for
Applicant(s).

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Rivkah Young   _December 23, 2005_
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Respectfully submitted,

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